



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

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SDMS DocID 2240060

Ms. Ann Breslin
DE Department of Natural Resources
and Environmental Control
391 Lukens Drive
New Castle, DE 19720-2774

22 FEB 2000

re: 12th Street Landfill/Dump Site

Dear Ann:

This correspondence serves to provide the most recent status of the Removal Assessment of the above-mentioned Site, notify the Department of Natural Resources and Environmental Control of impending Removal actions, and request that the Department identify Applicable or Relevant and Appropriate Requirements (ARARs) for the proposed Removal Action.

EPA's Removal Assessment of the 12th Street Landfill/Dump Site, located along the Brandywine Creek near the Pullman/Palace Site, is essentially complete. Our Assessment found that the 12th Street Landfill/Dump Site (Site) is the source of a significant concentration of hazardous substance contamination, most notably lead, to the environment. Lead now migrates from the Site to the sediment of the Brandywine Creek. The Assessment found lead contamination exceeding 200,000 mg/kg in the soil and 19,500 mg/kg in the Creek sediment. Several crushed drums of unknown waste materials were also found in the subsurface and exposed in the Creek bank.

Although no promulgated standards for contaminant concentrations in Creek sediment have been identified, EPA finds that the concentrations of hazardous substances, most notably lead, in the Creek sediment exceed benchmark levels above which adverse biological effects to aquatic organisms are likely. In fact, the concentrations of lead in the impacted Creek sediment are at least two orders of magnitude higher than benchmark levels. Several agencies, including EPA, National Oceanic and Atmospheric Administration (NOAA), and U.S. Fish and Wildlife Service (FWS), find that cleanup activities are required to minimize adverse environmental impact. DNREC has also agreed with this finding.

The Site is located in the Federal On-Scene Coordinator (FOSC) jurisdiction of the U.S. Coast Guard. However, the U.S. Coast Guard FOSC, has requested that EPA continue as the lead federal agency for this Site.

EPA recommends that cleanup activity occur at this Site. The OSC has determined that the Site poses a threat or potential threat to human health or the environment and has proposed a

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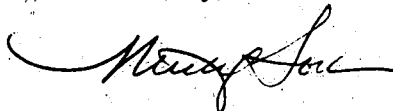
Removal Action to mitigate these threats. The threats and proposed Removal Action are summarized in the attached draft Action Memorandum prepared by the OSC (which is subject to change until approved by EPA). Briefly, the proposed actions include: 1) installation of erosion and sedimentation controls consistent with Delaware's handbook, 2) isolation of the Site from the Creek during major earth disturbance activities, 3) removal of drummed wastes and limited areas of contaminated soil, 4) placement of a protective cover over remaining areas of contaminated soil (intending to cover soil areas exceeding an average lead concentration of 400 mg/kg), and 5) removal of contaminated Creek sediment to ensure that remaining Creek sediment lead levels do not exceed an average concentration of 91.3 mg/kg along the Site. Many of the details of the proposed Removal Action will be developed as the project progresses and I hope that EPA can rely upon DNREC for assistance in developing actions consistent with State ARARs.

EPA has arranged for its contractor representatives to attend a DNREC course entitled Sediment and Stormwater Certified Construction Reviewer Course this March. EPA will rely upon the assistance of these contractor personnel to guide Removal Actions under the direction of the OSC. However, Removal Actions are proposed to initiate prior to completion of this course. As such, the OSC will rely upon our knowledge of the State's E&S Control Handbook and guidance from DNREC to ensure that initial Removal activities are consistent with State E&S Control program requirements.

This letter requests DNREC to identify the ARARs for the proposed Removal Action. The scope is outlined in the attached Action Memorandum. Identification of ARARs prior to March 10, 2000, is requested.

I may be contacted at (215) 814-3272 if there are any questions concerning this Site or this correspondence.

Sincerely,



Michael Towle,
On-Scene Coordinator

attach: draft Action Memorandum